

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

In the Matter of the Petition

of

GRACE OCEAN PRIVATE LIMITED, as

Owner of the M/V DALI,

and

SYNERGY MARINE PTE LTD, as Manager of  
the M/V DALI,

for Exoneration from or Limitation of Liability.

Docket No. JKB 24-CV-941

**CLAIM OF TIMOTHY MARK WILSON FOR LOSSES INCURRED**

**I. Claimant Information**

Timothy Mark Wilson

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**II. Claim**

I am filing a claim against the Petition for Limitation of Liability filed by Grace Ocean Private Limited and Synergy Marine Pte Ltd. ("Petitioners") in the above-entitled action. The Petitioners

seek to limit all liability resulting from allision of the M/V Dali with the Francis Scott Key Bridge.

I am filing this claim as the owner of a container of household goods that were aboard the M/V DALI and were significantly delayed due to the incident, incurring tangible losses as a result.

### **III. Damages**

I moved with my wife, toddler, and infant child from the USA to Australia, and while I had a small consignment of household goods in air freight, it was not sufficient to sustain my family for the extended shipping delays. I have been forced to repurchase essential household items which, but for the delays to the petitioners' vessel, would not have been necessary. These costs incurred or anticipated, detailed in Annex A, total \$6,054 AUD

**Note:** receipts are not available for purchases, due to a combination of factors:

- Many early purchases being made on a Bank of America credit card, the account associated with which is now closed.
- Efforts to mitigate damages/loss by purchasing items second hand, without receipts;
- An oversight in not considering it a priority when dealing with a stressful situation and supporting my young family through an international move.

To support my claim, I am providing the following evidence:

- **Exhibit A:** Bill of Lading: A copy of the bill of lading is attached, which clearly demonstrates my ownership of the goods that were on board the M/V DALI.
- **Exhibit B:** Freight Inventory: Full inventory of items aboard the vessel. This demonstrates the value of the items, most of which are substantially more than the

damages claimed, demonstrating the reasonableness of the claim, and providing evidence of my efforts to mitigate my losses through frugal limitations on purchases.

- **Exhibit C:** Air Freight Inventory: Listed to supplement the Sea Freight Inventory above, as several items were moved to Sea Freight due to space constraints.
- **Exhibit D:** Email from Allied International. This email provides evidence of which items listed on Air Freight Inventory were in fact aboard the M/V Dali and are therefore within the scope of this claim.
- **Exhibit E:** Email from Bank of America: This provides evidence of why bank statements supporting purchase values are unavailable, by confirming that the account used for many purchases immediately upon my arrival in Australia is now closed.

#### **IV. Relief Requested**

I request that the Court deny the Petitioners' limitation of liability and grant me full compensation for the damages I have incurred and reasonable anticipate, totalling \$6054 AUD. I further request to reserve the right to pursue future damages, up to the full value of \$83,405, as I have not received evidence that my container is accounted for and undamaged.

#### **V. Verification**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Timothy Mark Wilson

24 September, 2024.

**Filing and Service**

I understand that the deadline for filing claims is September 24, 2024. I am submitting this claim within the designated timeframe.

I have served this claim on the Petitioners' attorneys, as follows:

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**Annex A – Costs Incurred or Anticipated Due Shipping Delays****Table 1. Essential household items which have been replaced:**

no	Item description	Inventory ref	Cost / Value
1	Crib	Attachment B, Supplementary Sht (3), item 8	300
2	Crib Mattress	Attachment B, Supplementary Sht (3), item 11	500
3	Pram seat, Adaptors	Attachment C, Supplementary Sht, item 9	319
4	Children's Clothing	Attachment C, Clothing, item 7	500
5	Adult Clothing incl. business wear	Attachment C, Clothing, items 6 & 7	800
6	Misc. Children's toys	Attachment B, Supplementary Sht 3, items 1-7 Attachment C, Supplementary Sht, item 1	500
7	Children's Books	Attachment B, Recreational Items, item 14	300
8	Misc. Kitchenware	Attachment B, Kitchenware	400
9	Baby Swing	Attachment B, Electrical Items, item 1	70
10	Baby Change Table	Attachment C, Supplementary Sht, item 1	135
11	Baby Gates	Attachment C, Supplementary Sht, items 5 & 6	210
		<b>Total Cost</b>	<b>4034</b>

**Table 2. Anticipated future expenses, due to the change of season requiring clothing appropriate for tropical Australian summer, and my child outgrowing his crib.**

no	Item description	Inventory ref	Cost
1	Toddler Floor Bed	Attachment B, Supplementary Sht (3), item 9	650
2	Pram Rain covers & basket	Attachment C, Supplementary Sht, item 9	120
3	Summer linen bedsheets	Attachment B, Linen, item 9.	250
4	Men's summer business attire	Attachment B, Clothing, item 14.	500
5	Women's summer attire	Attachment B, Clothing, item 13	500
		<b>Total Cost</b>	<b>2020</b>

Note that every reasonable effort has been made to minimize losses. the costs incurred are well below the inventory value of the delayed items, and the total expenses incurred and anticipated is approximately 7% of the total value of the household goods being shipped.

Further Note: Attachment C references items which were listed to be shipped via Air Freight.

Exhibit E provides evidence that a proportion of the items assigned to Air Freight were moved to Sea Freight by the carrier due to space constraints.